

ETHICAL CODE FOR AMPER GROUP PROVIDERS

Corporate Policy

Adopted by the Governing Council on 29 April 2025

1. INTRODUCTION

The aim of the Code is to reflect the basic ethical principles of mandatory compliance and the patterns of conduct that should guide the performance of suppliers and other members of the Amper Group value chain.

This Code of Ethics aims to collect the values that Amper Group expects from its suppliers, subcontractors, collaborators or trading partners. Accepting and complying with this Code of Ethics for Suppliers is essential in order to establish commercial relations with the Amper Group.

2. SCOPE

This Code of Ethics applies to all suppliers, contractors, subcontractors, collaborators or business partners of Amper S.A. or any of the companies of the Amper Group that have direct or indirect relationship with the Amper Group. Throughout this document we will refer to all of them as “suppliers”.

Doubts about the application of this Code of Ethics for suppliers, whether an activity, action or omission constitutes or may constitute a breach of the Code or wish to make any suggestions should be addressed to the Compliance Directorate of the Amper Group at the e-mail address compliance.normative@groupamper.com

3. COMMITMENTS OF AMPER GROUP PROVIDERS

Health and Safety at Work

Amper Group providers are committed to providing a safe and healthy working environment for their employees and for those who visit or work in their facilities and work areas.

Suppliers shall comply with labour risk prevention legislation. This commitment is based on the adoption of international standards as management models for risk prevention in their activities and facilities. They shall also establish such action plans as may be necessary to properly manage and mitigate the risks associated with their activities. These plans will be reviewed on a regular basis and the necessary resources will be provided for their maintenance and improvement.

Place of work free of harassment

Providers shall defend the right to work in an environment free from intimidation, harassment and abuse. Thus, they will reject any form of slavery, human trafficking, forced labour or labour performed under duress and any form of child labour.

Equal opportunities and non-discrimination

Providers shall reject any discrimination against their employees or candidates in respect of their employment or occupation on the basis of race, colour, sex, descent, nationality, religion, age, political opinion, physical or mental disability, medical condition, sexual orientation, extraction or social origin, language, marital status or any other status, as provided for in local law.

Suppliers shall base the relationship with their employees on the principles of diversity, equal opportunities and treatment in employment.

Conflict of interest

A conflict of interest may arise when you have opposing personal interests, that interfere or that could be perceived as interference with the ability to make an objective business decision.

It is expected that each of the Amper Group's suppliers will maintain mechanisms to guarantee independence in their performance, implementing mechanisms to detect and manage these types of situations.

4. RESPONSIBILITIES FOR PROVIDERS CONCERNING THE PROTECTION OF INFORMATION

Sensitive information and intellectual property

Suppliers who have access to confidential or non-public information of the Amper Group should protect such sensitive information, as well as information entrusted to them by others, except where disclosure is authorized or subject to legal requirement.

Likewise, if you have access to information about the Company's intellectual property, such information should not be disclosed to anyone, except where such disclosure is authorized by Grupo Amper or subject to legal requirement.

It is the responsibility of the supplier to take all necessary measures to ensure the confidentiality of the information provided to him.

5. RESPONSIBILITIES OF PROVIDERS WITH THE ENVIRONMENT

Human Rights

The Amper Group wishes to extend to its suppliers its commitment and link to the human rights recognized in national and international law in accordance with:

- OECD Guidelines for Multinational Enterprises (OECD MNEs)
- The United Nations Guiding Principles on Business and Human Rights (UNGPs)
- Conventions of the International Labour Organization

- The International Charter of Human Rights, included in UNGP,

In addition, suppliers undertake to work in accordance with the Principles of the Covenant

The United Nations Global Declaration, with the Sustainable Development Goals (SDGs) and the Tripartite Declaration of Principles on Multinational Enterprises and Social Policy, as well as documents and texts that may replace or supplement those referred to above.

In particular, suppliers express their total rejection of child labour and forced or compulsory labour and undertake to respect the freedom of association and collective bargaining, the right to move freely within each country, non-discrimination on any grounds or circumstance, the rights of ethnic minorities and indigenous peoples in the places where they operate, as well as to promote an open dialogue that integrates different cultural frameworks.

Environment

Suppliers shall comply with all obligations arising from environmental implementation, in particular from respect for and protection of the environment, by complying with or improving the standards set out in the implementing environmental legislation, minimizing and/or compensating for the impact their activities may have on the environment and promoting actions that contribute to its protection. This includes responsible waste management, efficient use of natural resources, reduction of polluting emissions, and promotion of clean energy and sustainable technologies.

Suppliers will also be valued for undertaking or sponsoring research and development projects that promote decarbonization of the economy and continuous improvement in its environmental practices.

Combating bribery, corruption and money-laundering

The Amper Group maintains a zero-tolerance approach to practices related to corruption, fraud and bribery, and, in general, to any unlawful or fraudulent behaviour, and it is imperative that this zero-tolerance principle be shared with our suppliers.

To this end, no vendor shall make any inappropriate payments in all activities of the supplier or to governmental entities such as the private sector.

No bribes or illegal commissions are paid, under any circumstances.

With regard to money-laundering, it was a global problem with serious consequences. It is defined as a set of mechanisms or procedures designed to give the appearance of legitimacy or legality to assets of criminal origin, and is not limited to cash transactions. Participation in such activities undermines integrity, damages reputation and may expose the Panel and its employees to severe sanctions.

The Amper Group is committed to compliance with the current money-laundering standard.

Gifts, gifts and hospitality

Suppliers and their employees may only make gifts provided that the independence, integrity and/or honesty of the recipient cannot be compromised when making a business or business decision and, in any case, that:

- a) are of irrelevant or merely symbolic economic value; in no case may their amount exceed one hundred (100) euros.
- b) constitute customary gestures of courtesy or standard commercial hospitality; and
- c) are not prohibited by law, by the Governance and Sustainability System, or by generally accepted commercial practices.

International commercial traffic

Group Amper suppliers shall respect the trade, import and export control laws of all countries in which they operate.

Protection of competition

Group Amper believes in free and open competition and does not tolerate its suppliers engaging in inappropriate practices that may limit free competition. Amper Group providers should not gain competitive advantages through unethical or illegal business practices.

6. COMMON PROVISIONS

Complaint channel

The Amper Group has designated as the Head of the Internal Information System the Regulatory Compliance Officer, who is responsible for administering the communications received, carrying out a rigorous analysis of them and treating them with the utmost confidentiality and confidentiality. All those bound by the Code of Ethics may report any action they consider to be contrary to the laws, internal rules of the company and principles of the Code, by means of the following means:

- Web: <https://www.grupoamper.com/form-reports/>, which is received by the Responsible Amper Group Compliance Standards.
- Postal mail: to the attention of the Compliance Management Amper Group: C/ Virgilio,2 (Edif. 4). Image City CP.28223, Pozuelo de Alarcón, Madrid).
- E-mail: comiteetica@grupoamper.com, which is received by the director of the legal department as a member of the Ethics Committee.
- Face-to-face: face-to-face meeting with the Compliance Officer at headquarters C/ Virgilio,2 (Edif. 4). City of Image CP.28223, Pozuelo de Alarcón, (Madrid).

Reporting Principles of Complaints through the Complaints Channel

Communications made through the complaint channel must always comply with criteria of truthfulness and proportionality and may not be used for purposes other than those that pursue compliance with this Code of Ethics or the legislation in force.

Complaints may be made anonymously through the complaint channel.

The identity of the person who communicates an irregular action through the Channel (if identified) shall be considered confidential information and shall therefore not be communicated to the respondent or to any other third party without his consent, thus guaranteeing the confidentiality of the complainant's identity.

The Group undertakes not to adopt and ensure that no professional takes any form of retaliation, direct or indirect, against which it has communicated through the Channel conduct which, in accordance with the provisions of this Code of Ethics and other applicable domestic regulations and legislation, must be denounced, unless it has acted in bad faith.

Without prejudice to the foregoing, the personal data of the individuals making the communication, if known, may be disclosed both to administrative or judicial authorities, insofar as such authorities request them as a result of any proceedings arising from the subject matter of the report, and to the persons involved in any subsequent investigation or judicial proceedings initiated as a consequence of such investigation. Such disclosure of data to administrative or judicial authorities shall always be carried out in full compliance with the applicable personal data protection legislation.

Processing of complaints made through the complaint channel

The processing of complaints made through the channel authorized for this purpose is the responsibility of the Regulatory Compliance Officer. If the complaint concerns a member of that Directorate, the latter may not participate in its processing.

If the complaint concerns any member of the Board of Directors of the Company, the Compliance Authority shall inform the Secretary of the Board of Directors for the purpose of assisting him in the processing of the file and, in particular, in the selection of the instructor who, as a guarantee of independence, will be a person external to the Panel.

In the event that the matter concerns a sub-holding company or head of the Group's business, even if it has its own enforcement address, the Compliance Authority of Grupo Amper will investigate the complaint.

Any investigation shall guarantee the rights to privacy, defence and the presumption of innocence of the persons under investigation.

Interpretation and integration of the Code of Ethics

This Code of Ethics for Suppliers (which includes other actors in the value chain) will be interpreted in accordance with the Amper Group's Governance and Sustainability System.

The Compliance Authority of the Amper Group is the body responsible for the general interpretation and integration of this Code of Ethics.

This Code, by its nature, does not cover all possible situations, but sets out the criteria for guiding the conduct of the persons subject to it in their relations with the Amper Group and with third parties because of their links with the Group, as well as, where appropriate, resolving any doubts that may arise in the course of their professional activity.

Any doubts that may arise to the professionals of the Group about the interpretation of this Code should be consulted with the Compliance Officer.

CHANGE CONTROL

VERSION	DATE	ADOPTION BODY	OBJECT OF AMENDMENT
V.1.	29/04/2025	Board of Directors	Initial version